

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

BRYCE MARTINEZ	:	
	Plaintiff,	:
		: Civil Case No. 2:25-cv-00377-MRP
v.	:	
		: JURY TRIAL DEMANDED
KRAFT HEINZ COMPANY, INC., et al.	:	
	Defendants.	:

**STIPULATION TO EXTEND DEADLINE FOR DEFENDANTS
TO RESPOND TO COMPLAINT**

WHEREAS, on January 22, 2025, Defendant The Kraft Heinz Company, identified in the caption as Kraft Heinz Company, Inc., filed a Notice of Removal in this action;

WHEREAS, Defendants in this action have been served on various dates and therefore currently have differing deadlines to respond to Plaintiff's Complaint;

WHEREAS, the current earliest deadline for any Defendant to respond to the Complaint is January 29, 2025;

WHEREAS, to promote efficiency in responding to Plaintiff's Complaint, Defendants requested a uniform deadline and extension to respond to Plaintiff's Complaint and further requested that the deadline be the later of 60 days from January 29, 2025 or 30 days from a ruling on any motion to remand, should one be filed by Plaintiff;

WHEREAS, Plaintiff stipulates and agrees to this request; and

WHEREAS, an extension to respond to Plaintiff's Complaint will not otherwise impact any other deadlines in this matter.

IT IS THEREFORE STIPULATED AND AGREED that:

The deadline for all Defendants to respond to Plaintiff's Complaint is extended to the later of March 31, 2025 or 30 days from the ruling on any remand motion, should one be filed by Plaintiffs.

Pursuant to Local Rule of Civil Procedure 5.1.2(9), the undersigned attorneys have consented to the submission of this document by counsel for Defendant The Kraft Heinz Company.

Dated: January 28, 2025

s/K. Clancy Boylan

K. Clancy Boylan (Pa. Id. No. 314117)
MORGAN & MORGAN
2005 Market Street, Suite 350
Philadelphia, PA 19103
Tel: (215) 446-9795
Email: cboylan@forthepeople.com

Joshua M. Autry (Pa. Id. No. 208459)
MORGAN & MORGAN
199 Water Street, Suite 1500
New York, NY 10038
Tel: (859) 899-8785
Email: jautry@forthepeople.com

Dave Buchanan (Pa. Id. No. 320392)
Frazar Thomas (Pa. Id. No. 325478)
SEEEGER WEISS LLP
325 Chestnut Street, Suite 917
Philadelphia, PA 19106
Tel: (973) 639-9100
Email: dbuchanan@seegerweiss.com
fthomas@seegerweiss.com

Rene F. Rocha
MORGAN & MORGAN
400 Poydras Street, Suite 1515
New Orleans, LA 70130
Tel: (504) 636-6310
Email: rrocha@forthepeople.com

s/Chanda A. Miller

Chanda A. Miller
Cathryn N. Ryan
BARNES & THORNBURG LLP
Three Logan Square
1717 Arch Street, Suite 4900
Philadelphia, PA 19103
Tel: (445) 201-8920
Email: chanda.miller@btlaw.com
cathryn.ryan@btlaw.com

Michelle A. Ramirez
SIDLEY AUSTIN LLP
One South Dearborn
Chicago, Illinois 60603
Email: michelle.ramirez@sidley.com

Heidi Levine
Alan E. Rothman
SIDLEY AUSTIN LLP
787 Seventh Avenue
New York, New York 10019
Tel: (212) 839-5300
Fax: (212) 839-5599
Email: hlevine@sidley.com
arothman@sidley.com

Counsel for Defendant The Kraft Heinz Company, incorrectly named as Kraft Heinz Company, Inc.

T. Michael Morgan
Jennifer Winn
MORGAN & MORGAN
20 N Orange Ave., Suite 1600
Orlando, FL 32801
Tel: (407) 418-2031
Email: mmorgan@forthepeople.com
jwinn@forthepeople.com

Christopher A. Seeger
Parvin K. Aminolroaya
SEAGER WEISS
55 Challenger Road
Ridgefield Park, NJ 07660
Tel: (212) 584-0700
Email: cseeger@seegerweiss.com
paminolroaya@seegerweiss.com

Frank Petosa
MORGAN & MORGAN
8151 Peters Road, Suite 4000
Plantation, FL 33324
Tel: (954) 318-0268
Email: fpetosa@forthepeople.com

Counsel for Plaintiff

s

s/Allison M. Brown
Allison M. Brown (Pa. Id. No. 202227)
SKADDEN, ARPS, SLATE, MEAGHER
& FLOM LLP
One Manhattan West
New York, NY 10001
Tel: (212) 735-3222
Email: allison.brown@skadden.com

*Counsel for Defendant Mondelēz
International, Inc.*

s/David F. Abernethy
David F. Abernethy (Pa. Id. No. 36666)
FAEGRE DRINKER BIDDLE
& REATH LLP
One Logan Square, Suite 2000
Philadelphia, PA 19103
Tel: (215) 988-2700
Email:
david.abernethy@faegredrinker.com

*Counsel for Defendant Post Holdings,
Inc.*

s/Frederick P. Santarelli
Frederick P. Santarelli (Pa. Id. No. 53901)
ELLIOTT GREENLEAF, P.C.
Union Meeting Corporate Center V
925 Harvest Drive, Suite 300
Blue Bell, Pennsylvania 19422
Tel: (215) 977-1024
Email: FPSantarelli@elliottgreenleaf.com

Michael Holecek (pro hac vice)
GIBSON, DUNN & CRUTCHER LLP
333 South Grand Avenue
Los Angeles, CA 90071-3197
Tel: (213) 229-7000
Email: mholecek@gibsondunn.com

Counsel for Defendant Kellanova

s/Mark A. Aronchick

Mark A. Aronchick (PA Id. No. 20261)
HANGLEY ARONCHICK SEGAL
PUDLIN & SCHILLER
One Logan Sq.
27th Fl.
Philadelphia, PA 19103
Tel: (215) 568-6200
Email: maronchick@hangley.com

Angela M. Spivey
Andrew G. Phillips
Jamie S. George
ALSTON & BIRD LLP
One Atlantic Center
1201 West Peachtree Street, Suite 4900
Atlanta, GA 30309-3424
Email: angela.spivey@alston.com
andrew.phillips@alston.com
jamie.george@alston.com

Counsel for Defendant The Coca-Cola Company

s/Craig D. Singer

Craig D. Singer (Pa. Id. No. 71394)
Paul E. Boehm
Dane Butswinkas
WILLIAMS & CONNOLLY LLP
680 Maine Avenue, S.W.
Washington, DC 20024
Tel: (202) 434-5000
Email: csinger@wc.com
pboehm@wc.com
dbutswinkas@ wc.com

*Counsel for Defendant Mars,
Incorporated*

s/Hope S. Freiwald

Hope S. Freiwald (Pa. Id. No. 60187)
DECHERT LLP
2929 Arch Street
Philadelphia, PA 19104
Tel: (215) 994-2514
Email: hope.freiwald@dechert.com

Counsel for Defendant PepsiCo, Inc.

s/Tiffany M. Alexander
Tiffany M. Alexander (Pa. Id. No. 88681)
NELSON MULLINS RILEY &
SCARBOROUGH LLP
1000 Westlakes Drive, Suite 275
Berwyn, PA 19312
Tel: (610) 943-5351
Email: Tiffany.alexander@nelsonmullins.com

Counsel for Defendant General Mills, Inc.

s/Jasmeet K. Ahuja
Jasmeet K. Ahuja (Pa. Id. No. 322093)
Hogan Lovells US LLP
1735 Market Street, 23rd Floor
Philadelphia, PA 19103
Tel: (267) 675-4667
Email: jasmeet.ahuja@hoganlovells.com

Counsel for Defendant Nestlé USA, Inc.

s/John S. Stapleton
John S. Stapleton (Pa. Id. No. 200872)
STAPLETON SEGAL COCHRAN LLC
1760 Market Street, Suite 403
Philadelphia, PA 19103
Tel: (215) 561-1500
Email: jstapleton@stapletonsegal.com

Counsel for Defendant WK Kellogg Co.

s/Stephen J. McConnell
Stephen J. McConnell
REED SMITH LLP
Three Logan Square, 1717 Arch Street, Suite
3100
Philadelphia, PA 19103
Tel: (215) 851-8121
Email: smcconnell@reedsmith.com

Melissa A. Geist
REED SMITH LLP
506 Carnegie Center, Suite 300
Princeton, NJ 08540
Tel: (609) 987-0050
Email: mgeist@reedsmit.com

Counsel for Defendant Conagra Brands, Inc.

IT IS SO ORDERED:

Dated: _____

Hon. Mia Roberts Perez